



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 15 2019

CERTIFIED MAIL 7018 2290 0000 9993 5446

RETURNED RECEIPT REQUESTED

Mr. Harvey Gosnell
Plant Lead Manager
Concrete Supply Company
1401 Highway 101
Greer, South Carolina 29651

Re: Compliance Stormwater Evaluation Inspection
Concrete Supply Co. Greer, South Carolina, Permit SCR005480

Dear Mr. Gosnell:

On May 29, 2019, the U.S. Environmental Protection Agency Region 4 (EPA) conducted a Compliance Stormwater Evaluation Inspection (CSWEI) at the Concrete Supply Company Greer facility located at 1401 Highway 101, Greer, South Carolina. The purpose of the CSWEI was to evaluate the facility's compliance with the requirements of Sections 301 and 402(p) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and, the State of South Carolina's industrial stormwater regulations.

The EPA appreciates your cooperation in conducting this CSWEI. Enclosed is the EPA's CSWEI report, evaluating your compliance with the CWA. As a result of the inspection, the EPA may be in further contact with Concrete Supply Company in the future.

While a response from you is not required at this time, if you do wish to respond to the CSWEI report, provide additional information, or otherwise discuss the report, please contact Mr. Mark Robertson at the above address or via email at robertson.mark@epa.gov.

Sincerely,

Daniel J. O'Lone, Chief

Stormwater and Residuals Enforcement Section
NPDES Permitting and Enforcement Branch

Enclosures

cc: Mr. Brian Wisnewski
South Carolina Department of Health and Environmental Control
Mr. Johnie Alexander
CSC LLC



U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Report

FACILITY DATA

NPDES ID: SCR005480	Effective Date: 10/1/16	Expiration Date: 9/30/21
Facility Name: Concrete Supply Co. – Highway 101 Ready-Mix Plant		SIC Code: 3273
Address: 1401 Highway 101, Greer, SC		
On-Site Representative(s), Title, Phone Number: Harvey Gosnell, Plant Lead Mgr. Concrete Supply Co. 1401 Highway 101, Greer, SC 29651		Responsible Official, Title, Phone Number, Mailing Address: Johnie Alexander, Environmental Manager 3823 Raleigh Street, Charlotte, NC 28206 Johnie.Alexander@concretesupplyco.com

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 5/29/19 @ 1:15 pm	Exit Date/Time: 5/29/19 @ 5:30 pm
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NAMES OF EPA AND STATE INSPECTORS

EPA, Region IV: Kenneth Kwan & Mark Robertson
SCDHEC: Paul Wise

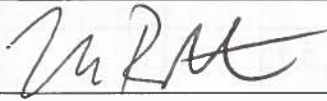


AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent/ Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/ Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

INSPECTION NOTES

This was a joint state and EPA Compliance Stormwater Evaluation Inspection (CSWEI) focusing on the requirements of the South Carolina General Permit for Storm Water Discharges Associated with Industrial Activities.

EPA REPRESENTATIVES

Inspector Signature/Name	Office/Phone Number	Date
 Mark Robertson, Environmental Engineer	USEPA Region 4/ECAD-WEB-SGS 404-562-9639	8/13/19
 Kenneth Kwan, Environmental Engineer	USEPA Region 4/ECAD-WEB-SGS 404-562-9752	8/13/19
Management Signature/Name	Office/Phone Number	Date
 Dan O'Lone, Section Chief	USEPA Region 4/ECAD-WEB-SGS 404-562-9434	8/14/19

1. FACILITY INFORMATION					
GPS Coordinates 34 54' 08.56" N 82 10' 12.49" W	Previous & current General Permit, SIU, & Other Media Permit Inspection focus on NPDES No. SCR005480				
Receiving Water(s), Wetlands, or MS4 Tributary to Abner Creek	Site Acreage & % Impervious Area 7.37 total with 28% impervious	Type of Ownership LLC	Qualify for No Exposure Exemption or No Discharge N/A		
SIC Code(s) Description (Primary & Secondary) 3273	Years in Operation Since 1992	No. of Employees 12	Hours & Days of Operation 7 days/week 12-15-hour day	Discharge to 303(d) Listed or TMDL Waters TMDL established for Enoree River Watershed	Weather Condition Clear

2. FACILITY'S OPERATION & PRODUCT DESCRIPTION
<p>The facility is a ready-mix concrete plant. It operates as a dry batch mode process: water is added to the truck mixer and predetermined amounts of aggregate, cement, fly ash, and admixture are mixed in each individual truck mixer to form various grades of concrete. The plant has a fleet of nine concrete trucks. Maintenance of these trucks is conducted offsite. Average monthly production rate is around 8,000 to 10,000 cubic yards of concrete. Most of the active plant area slopes toward the SE corner. Precipitation sheet flows into the catchment pond and discharges via outfall 001. The smaller N and SW areas of the plant drain to outfall 002.</p>

3. BASIC STORMWATER POLLUTION PREVENTION PLAN (SWPPP) INFORMATION			
SWPPP TOPICS	YES	NO	N/E
SWPPP on-site Part 5.3	X		
SWPPP Certification Part 5.1.7 A certification statement on page 2 of the SWPPP was missing the date and signature.		X	
SWPPP Modified or Update to Current Conditions Parts 3.1, 3.2, 5.2 The SWPPP described the facility as a satellite operation and only used on as-needed basis. Currently, this facility is a fully operational facility. Additional BMPs such as the gravel berm above the catchment pond, and the hay bales at outfall 002 observed during the inspection, were not addressed in the SWPPP.		X	
Pollution Prevention Team Named in SWPPP Part 5.1.1 The SWPPP was missing Section 3 regarding SWPPP committee members and assigned responsibilities in implementing the SWPPP.		X	
Employee Training for Stormwater Requirements Parts 2.1.2.9, 5.1.1.2, 5.1.5.1 Annual Employee training did not cover any of the five prescribed topics listed in the permit during the annual training events for 2018, 2017 and 2016.		X	
Site Description Part 5.1.2	X		

Site Map Part 5.1.2.c The site map did not show the location of additional BMPs such as the gravel berm above the catchment pond and the hay bales at outfall 002 that were observed during the inspection. The truck washdown area is a potential pollutant source and was not identified in the site map.		X	
Summary of Pollutant Sources Part 5.1.3, 5.4.12 The SWPPP identified five potential pollutant sources (fueling area, truck wash area, aggregate & sand storage, returned concrete, and admixture storage).	X		
Evaluation for Unauthorized Non-stormwater Discharges Part 5.1.3.4 & Part 8 There was no annual certification that the concrete truck wash basin was 100% recycled or, if not, discharged in accordance with an NPDES wastewater permit. (Neither 2017 nor 2018.) A visual examination was conducted each year, 2015-2018, for unauthorized discharges.		X	
Description of the Control Measures Parts 2.1.2.8, 5.1.4 Not all control measures were included in the SWPPP, but for those measures that were included, a description was provided.		X	
Schedule and Procedures for Good Housekeeping Parts 2.1.2.2, 5.1.5.1(a)(i) <ul style="list-style-type: none"> Good housekeeping practices regarding daily manual sweeping as mentioned by the staff were not in the SWPPP. The mechanical sweeping was being conducted twice per month but the SWPPP stated that it was to be done weekly. 		X	
Schedule and Procedures for Preventive Maintenance Parts 2.1.2.3, 5.1.5.1(a)(ii) <ul style="list-style-type: none"> A schedule for regular pickup and final disposal of solids in the slurry drying area was not addressed in the SWPPP. A schedule, criterion, and procedure for cleaning of the catchment pond was not addressed in the SWPPP. The permit requires that a pond must be cleaned out when the solids depth reaches two-thirds of the capacity or is within six inches elevation of the lowest outlet structure's elevation. 		X	
Spill Prevention & Response Procedures Parts 2.1.2.4, 5.1.5.1(a)(iii)	X		
Erosion and Sediment Controls and Management of Runoff Parts 2.1.2.5, 2.1.2.6, 5.1.4	X		
Schedule and Procedures for Monitoring Parts 2.1, 5.1.5.2, 6.2, App B	X		
Schedule and Procedures for Inspections Parts 2.1, 4.1.1, 5.1.5.2 Monthly routine inspection, quarterly visual assessment, and annual comprehensive inspections were addressed.	X		

4. RECORDS REVIEW			
Records Review	YES	NO	N/E
NOI Submitted to SCDHEC Part 1.3.1, 5.4.a,b The last NOI in the records notebook on-site was from 2013. Reauthorization to discharge was dated 6/26/17 from DHEC.	X		
Records of Incidents with Spills, Leaks, and/or Other Releases of Pollutants Part 5.4.d Spills were recorded three times during the 2017-2019 time frame.	X		
Records of Maintenance and Repairs of Control Measures Part 5.1.5.1 Records of corrective action were present for annual inspection results but not for quarterly inspection results.		X	

4. RECORDS REVIEW

Records Review	YES	NO	N/E
Records of Routine Inspections Parts 4.1, 5.4.f The records of routine inspections kept on-site were electronically generated from checklists maintained at corporate headquarters.	X		
Records of Periodic Monitoring (benchmark, visual assessments) Parts 4.2, 5.4.f, 6.1 Some of the benchmark samples had no collection information required to show that the sampling event occurred within 30 minutes of commencement of discharge, and >72-hrs after the last qualifying rain event. Quarterly visual assessments were not taken during periods of discharge for any of the quarters between the quarter ending June 2017 and the quarter ending March 2019.		X	
Records of Comprehensive Annual Inspections Parts 4.3, 5.1.3.4, 5.4.5	X		
Records of Employee Training Part 5.4.e Annual Employee training did not cover the five prescribed topics in the permit during any of the training events during 2016-2018, for example, good housekeeping practices.		X	
Records of Benchmark Sampling Parts 5.4.i, 6.2.1, 6.2.4 The records at the facility did not have results from benchmark sampling for three of the four quarters after the reissuance of the permit, as required. Inspectors observed only the data for outfall 002 for the March 2017 quarter.		X	
Records of Effluent Monitoring Parts 5.4.i, 6.2.2, 6.2.4, 7.3 Effluent limits do not apply to this facility.			X
Records of Corrective Actions Parts 3.3, 5.4.h One record of corrective action was recorded in the section of the records notebook. The annual inspection record sheets recorded some corrective actions. Other issues requiring corrective action were not recorded as addressed in the records on site.		X	
Records of Annual Reporting Parts 3.3.1&2, 4.3.1, 6.3.1, 7.4 Annual report copies in the records notebook were not originals, and therefore not signed by the author of the report.	X		

5. SITE EVALUATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), potential pollutant, and pollutants off-site
Loading/Unloading Operations	The cement raw material was in a silo. The loading area had some concrete dust accumulation.
Outdoor Storage Facilities	Aggregate and sand materials were stored outdoors in 3-sided concrete bins.
Outdoor Manufacturing/Processing Operations	Concrete dust between ½ inch and 1 inch deep was observed in the paved areas of the site. See photos DSCN1785 and DSCN1778 in the attached photo log.
Liquid Storage Tanks	Secondary containment around admixture tanks was closed and locked.

Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	The 10,000-gallon diesel fuel tank was double-walled. Trucks were washed outdoors, incorporating a mild acid/detergent solution to remove residue from truck exteriors. The wash water was captured for re-use in a lined concrete basin. See photo DSCN1790.
Management of Run-off Controls (storage areas, diversion ditches, dumpsters, secondary containment, & etc.)	The gravel berm used for filtering concrete fines from runoff was full of fines and minimally functional. That berm was not on the site map or in the SWPPP. See photo DSCN1780.
Sediment & Erosion Controls	Hay bales used for filtration at Outfall 002 were not in the SWPPP or on the site map. The hay bales at Outfall 002 were also not effective because they were degraded and did not cover the entire outfall area. See photo DSCN1787.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Evidence of Off-site Accumulation of Pollutants Observed in Receiving Water & MS4	Gray residue was observed below the outlet area of Outfall 001 and was traced from the outlet pipe to the stormwater ditch. See photos DSCN1782, DSCN1783, and DSCN1784.
Potential Non-stormwater Discharge Off-Site Observed	Excess concrete not used at customer locations was discharged to the ground adjacent to and uphill from the catchment pond, providing a potential discharge of process wastewater offsite. See photo DSCN1781.

Exit interview:

An exit conference was held with Todd Morris, Wayne Amaker, and Harvey Gosnell, Plant Manager, where the following preliminary observations were relayed to the company:

SWPPP:

- The SWPPP was missing section 3, SWPPP Committee and Assigned Responsibilities
- Good housekeeping practices regarding daily manual sweeping of the facility were not in the SWPPP.
- The mechanical sweeping was conducted twice per month but the SWPPP stated that it was to be done weekly.
- The final disposal of solids from the slurry drying area was not addressed by the SWPPP.

Records and Reports:

- Records of routine inspections were all filled in with pre-printed Xs. The forms were not the original documents.
- Benchmark sampling data was not available for outfall 001 for the first 4 quarters after reissuance of the permit, and were not available for outfall 002 for three of the first four quarters after reissuance. Facility staff stated that samples were taken, and that chain of custody forms were available elsewhere.
- Sampling events (both benchmark and quarterly visuals) did not contain information about rainfall intervals prior to sampling and related to the rain event sampled. Also, the available information did not document that the samples were taken in the first 30 minutes of the rain event.

- Annual Employee training did not cover the five prescribed topics in the permit during any of the training events in 2018, 2017 and 2016.
- Quarterly visual assessments of the stormwater discharge were not conducted during a period of flow for any of the quarters from the quarter ending 6/2017 through the quarter ending 3/2019.
- Annual comprehensive inspection reports on-site were not signed by the person conducting the inspections, Johnnie Alexander, for 2016, 2017, 2018, or 2019.
- There was no annual certification that the concrete truck water was recycled or discharged in accordance with NPDES wastewater permit requirements. (2017, 2018)

On-site Evaluation:

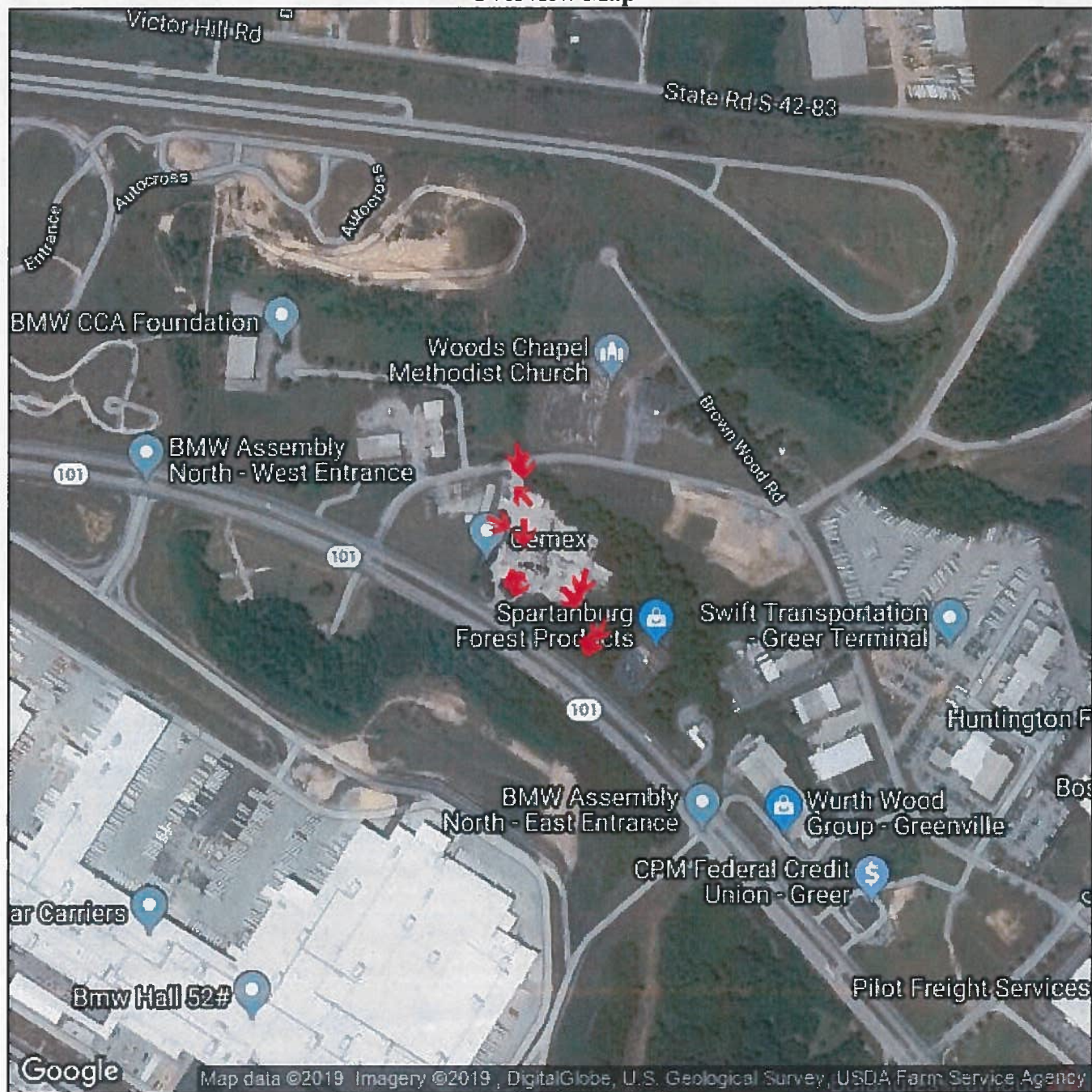
- Excess concrete not used at customer locations was discharged to the ground adjacent to and uphill from the catchment pond, providing a potential discharge of process wastewater to the stormwater collection system.
- Gray material was observed below the discharge of the pipe from the catchment pond and traced across the ground surface to stormwater drainage ditch adjacent to Highway 101.
- Concrete dust between ½ inch and 1 inch deep was observed in the paved areas of the site.
- Hay bales at outfall 002 were not in the BMPs listed within the SWPPP or on the site map. The bales were in poor condition.
- The gravel berm above the catchment pond was not in the SWPPP or on the site map.

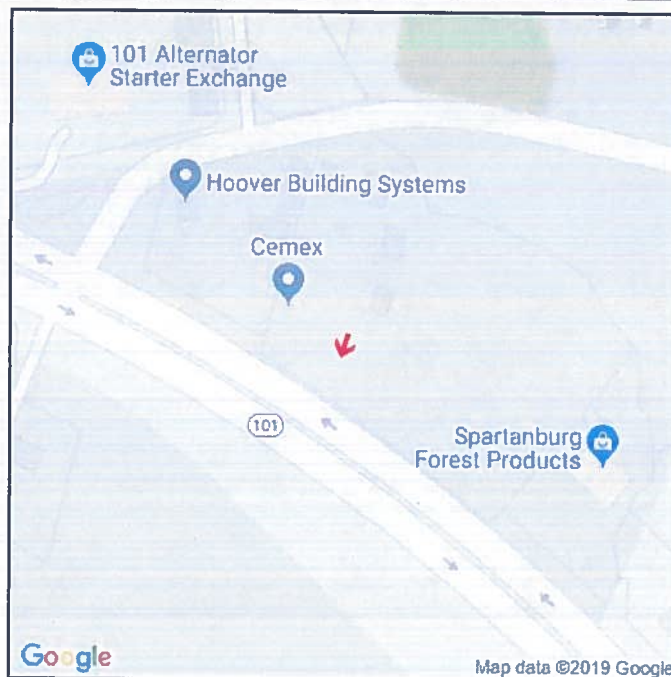
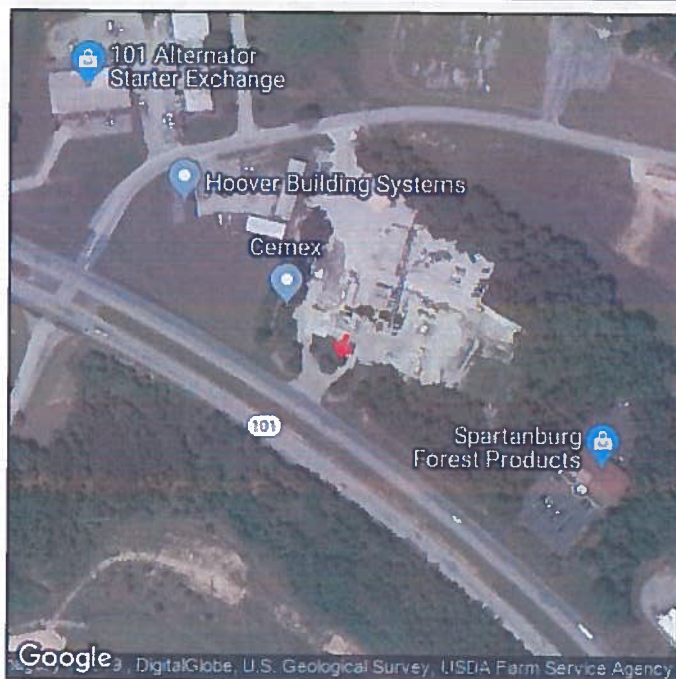
The photo log is attached.

CSC Greer ISW 2019
EPA R4 NPDES Inspection Photolog

Inspected 5/29/19

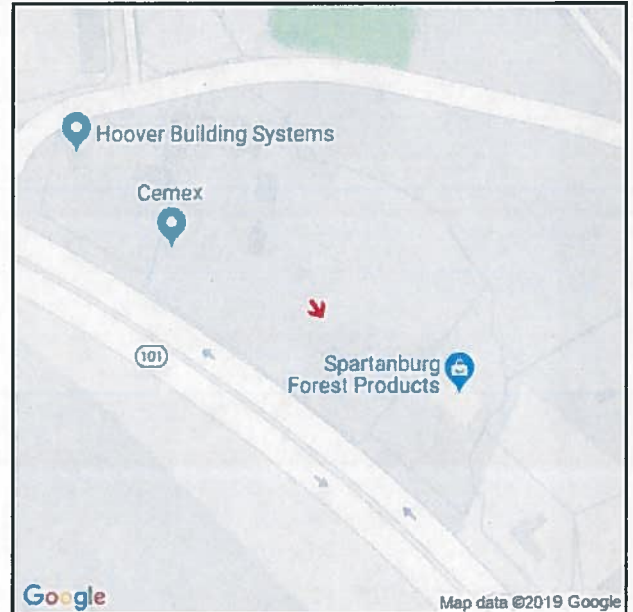
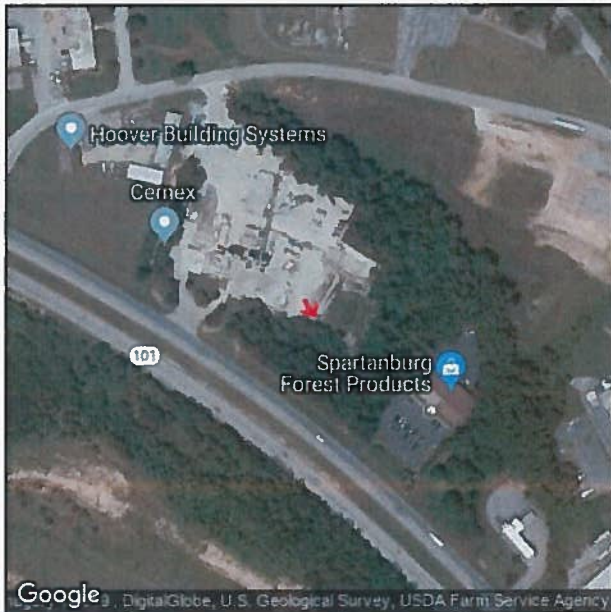
Overview Map





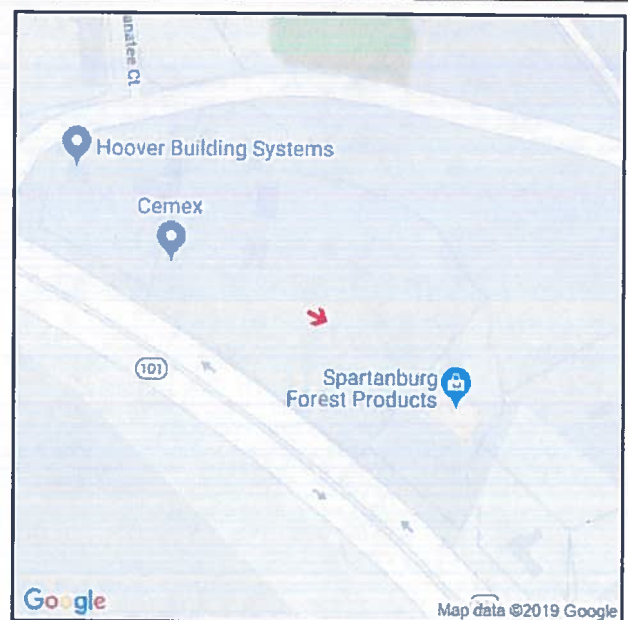
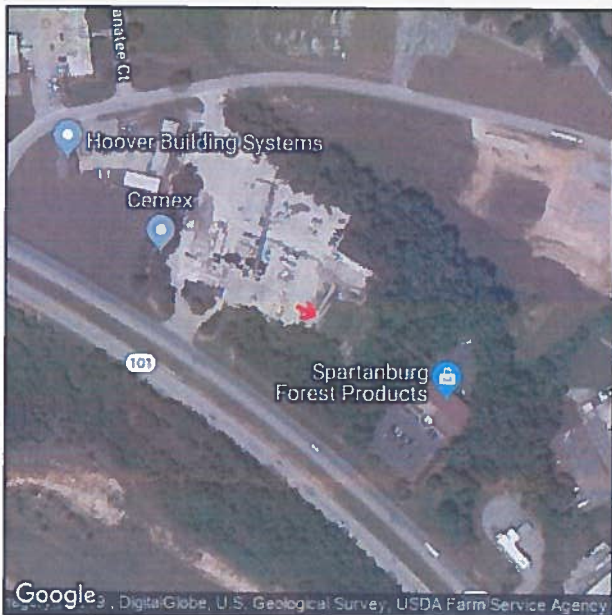
Attributes

Description	Exit gate for filled trucks, out to main road (Hwy 101). To right, basins for water capture, which have pumps for reuse.
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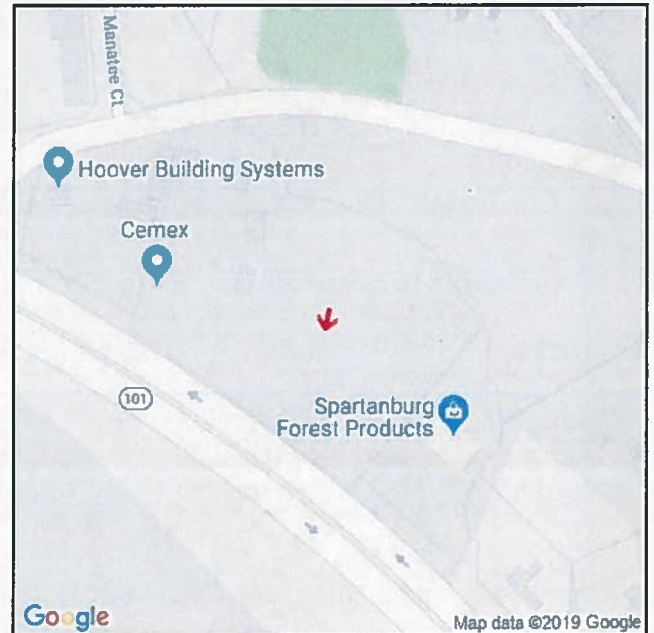
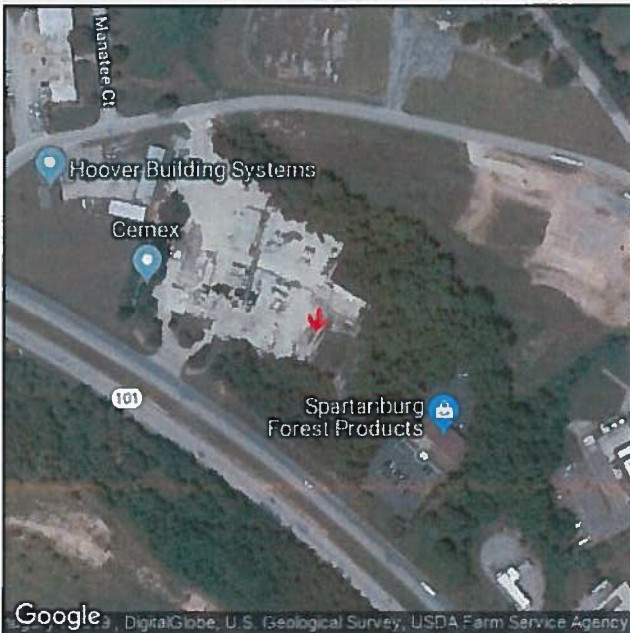
Attributes

Description	The main catch basin for runoff, near the SE corner of the site. Looking southerly. Primary pond in background, with outlet structure seen in center of photo. Outlet structure comprised of zinc-steel corrugated pipe; no holes in riser; outlet pipe at bottom of riser. This pond area collects most of the runoff from the site, except for an area at the NNW corner.
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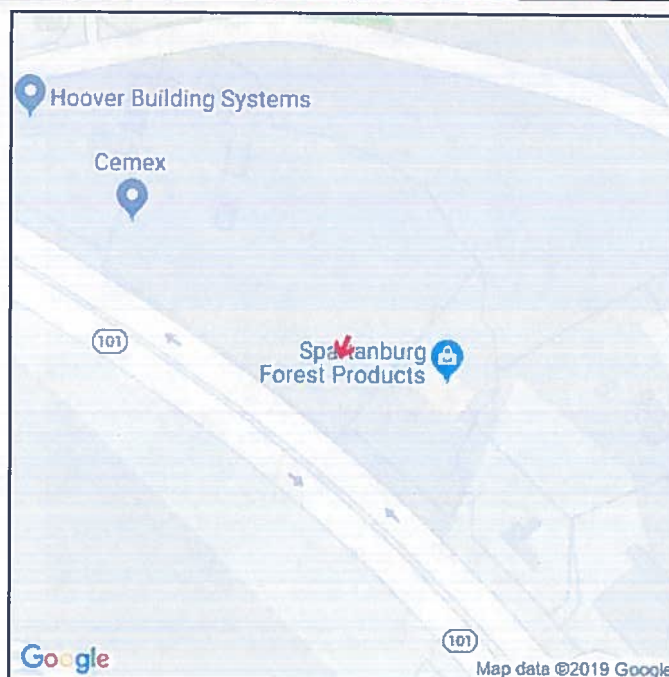
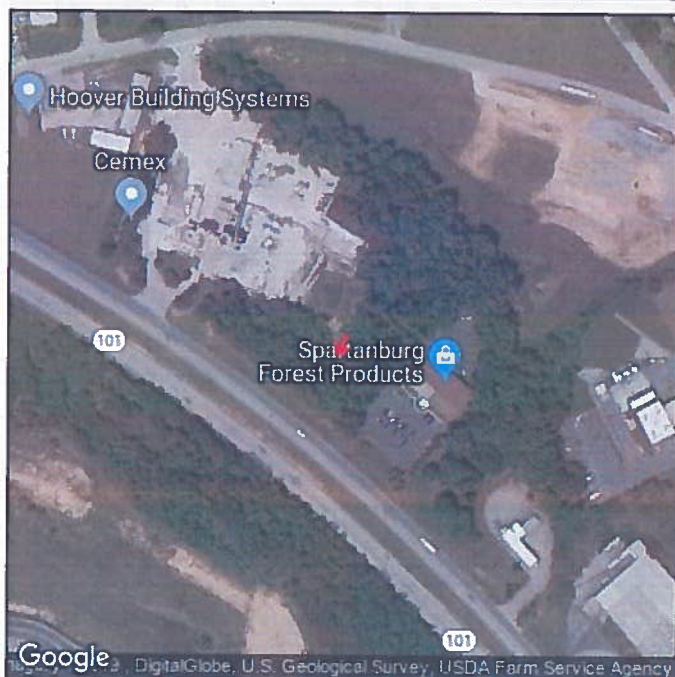
Attributes

Description	Second shot of the main catch basin for runoff, near the SE corner of the site. Looking southerly. This pond area collects most of the runoff from the site, except for an area at the NNW corner.
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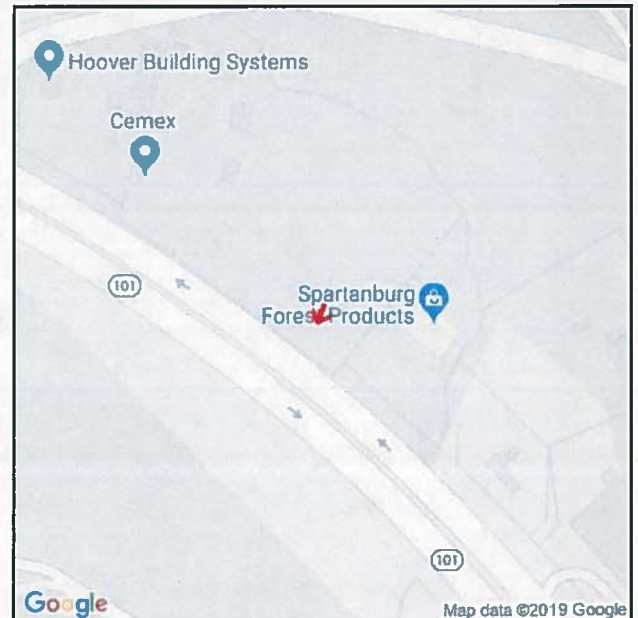
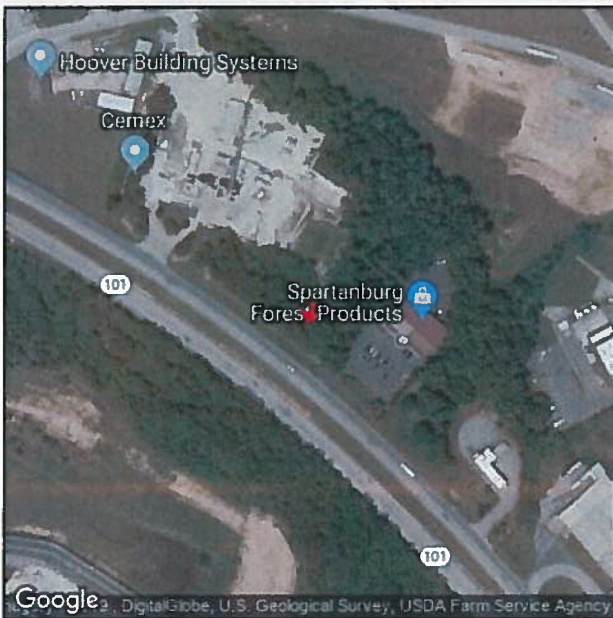
Attributes

Description	Area to the west of the stormwater collection pond for concrete rubble. Some unused fresh concrete had been wasted to this area recently. That represents a potential path for industrial/process water to exit from pour to the stormwater catch basin. In the photo, the stormwater basin is just off frame to the left (east). Looking southerly.
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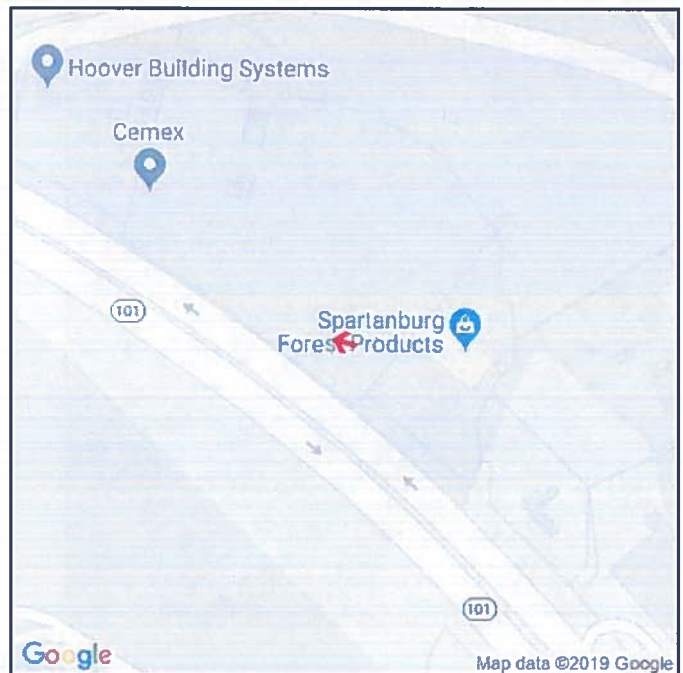
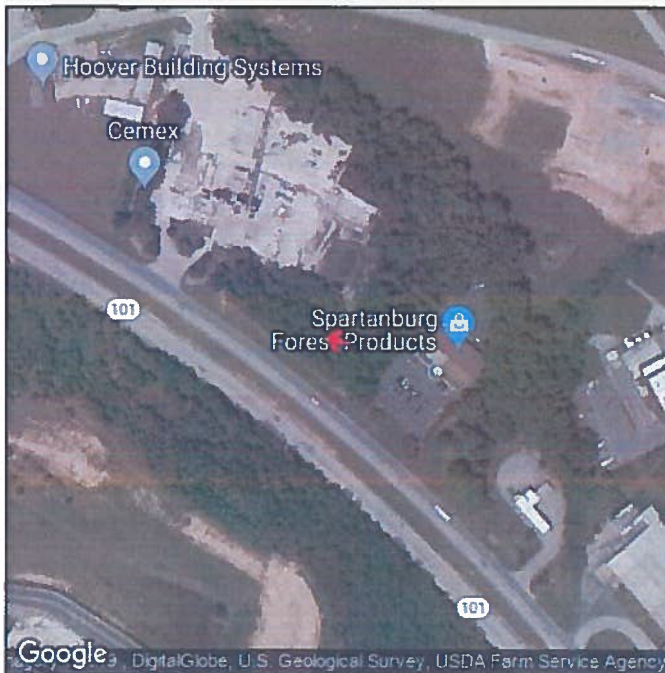
Attributes

Description	Outlet structure for the stormwater collection pond. White PVC pipe exits the riser shown in DSCN1779 and discharges water here. Not visible: ditch about 20 feet beyond this (circular) discharge spot, and Highway 101 just past that. Samples are taken from this pipe when flowing.
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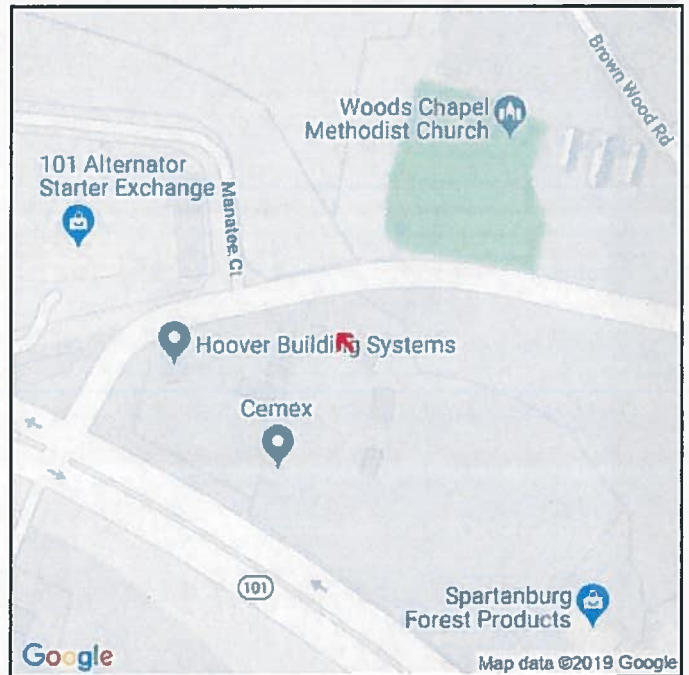
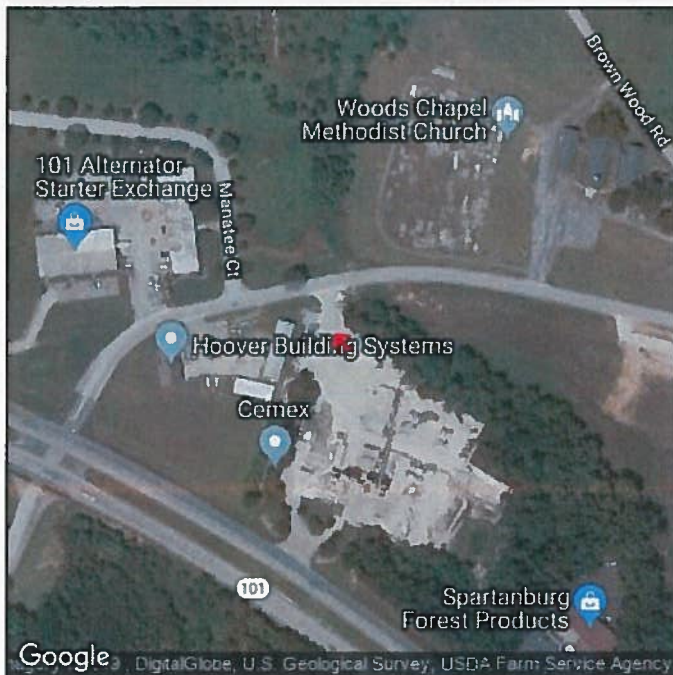
Attributes

Description	Flow from the outlet location seen in DSCN1782 exits the southerly end of a basin and flows across the surface through the brushy area. Looking more easterly, flow goes from left to right in this picture. Area between gray tree and two darker trees is the bottom of the ditch. Gray residue can be seen on the top of this side of the ditch (gray tree) and on the ditch bottom between the three trees.
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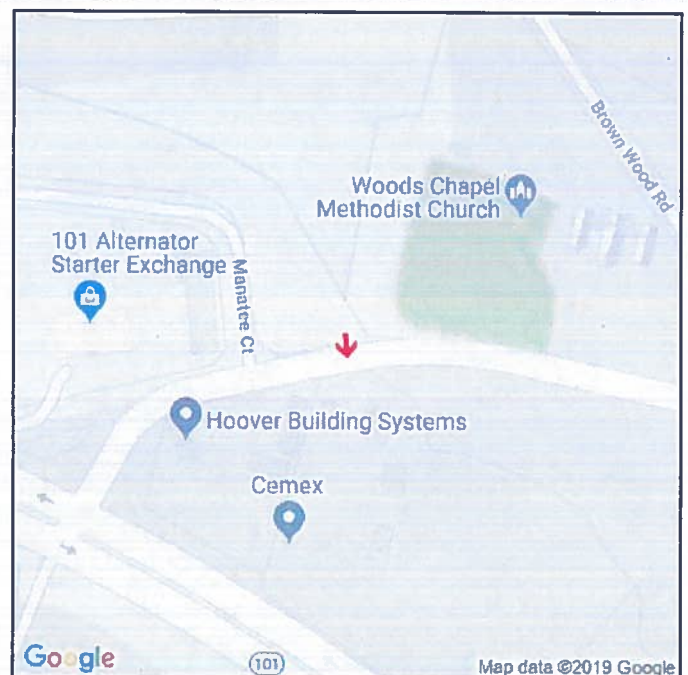
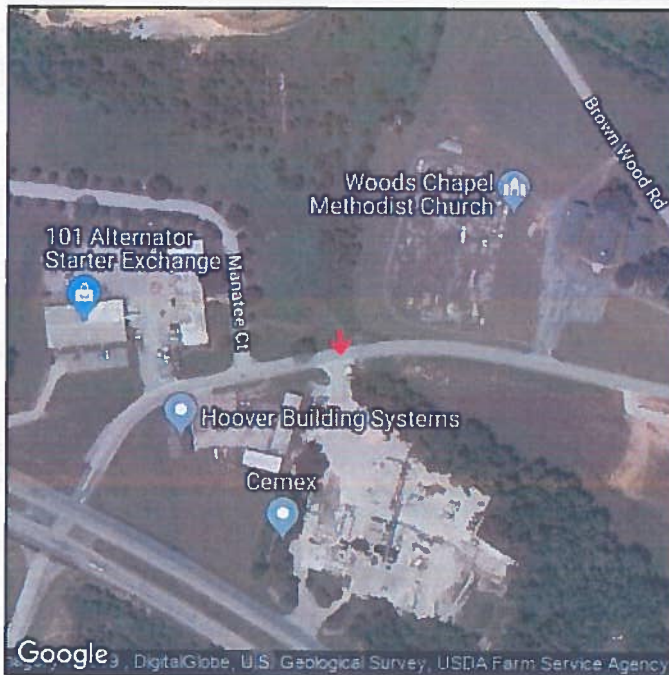
Attributes

Description	View of residue on bank (center-right) and bottom (near dark tree trunk). Same general location as DSCN1783, viewing from a different angle. Flow enters ditch in this view from right to left.
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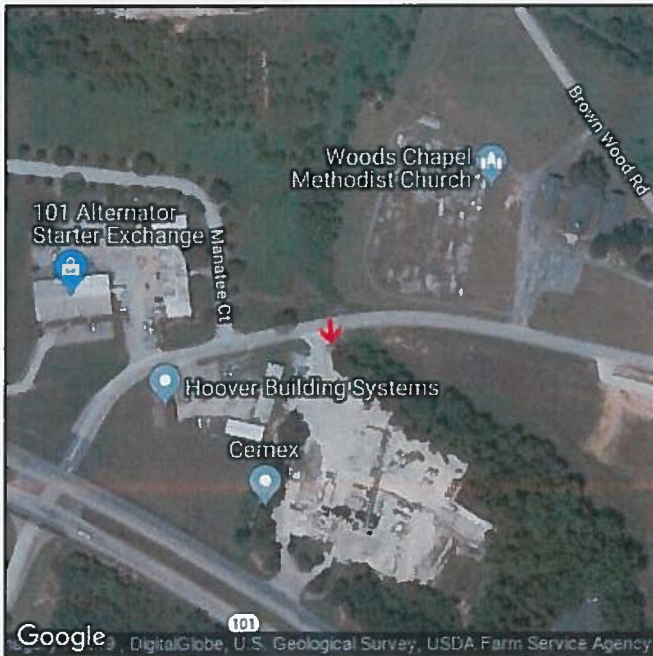
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Description	View of north exit from facility, onto Old Woodruff Road. Outfall 002 is outside the gate, on the right side in this view. Looking northerly. Flow from area where photographer is standing flows out to outfall 002.
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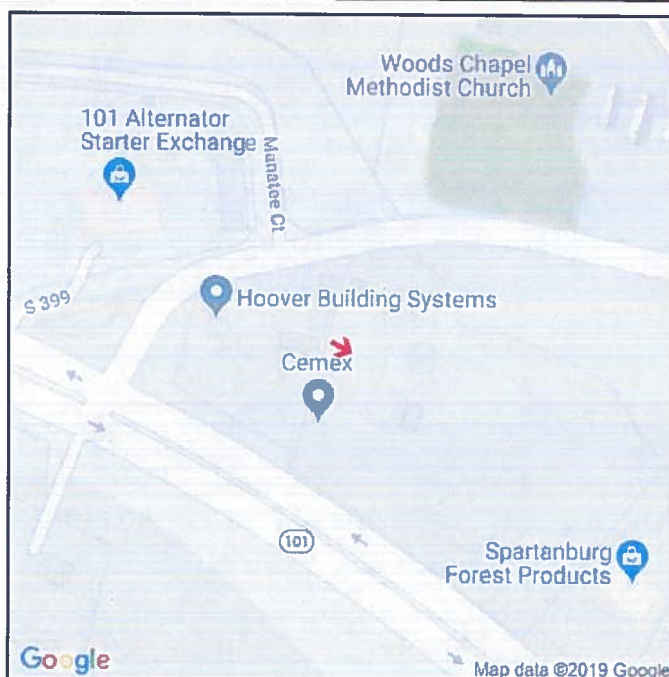
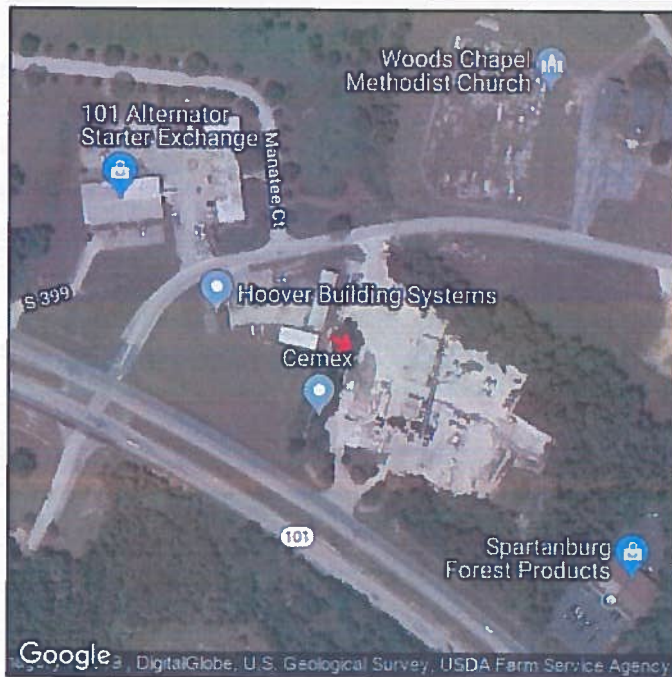
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Description	Another view of outfall 002 area, looking into facility. The outfall is just to left of left-most person in photo, down the hill. Looking southerly.
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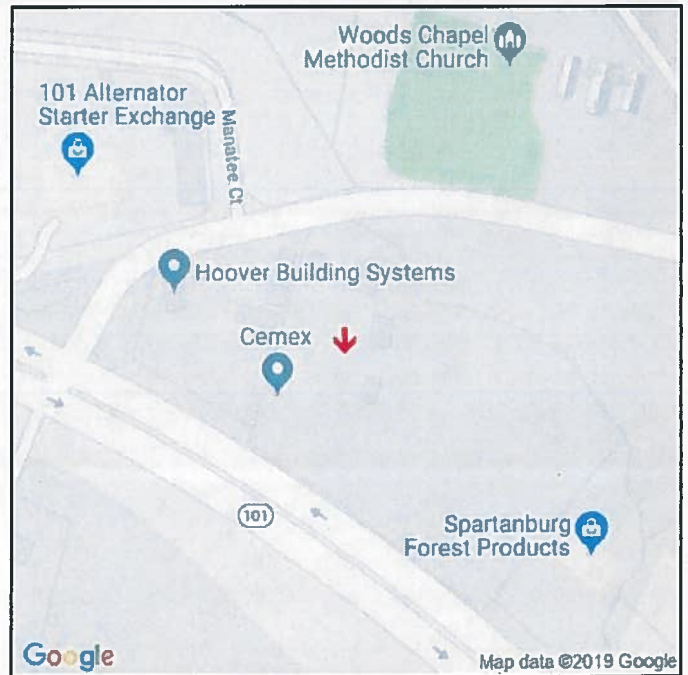
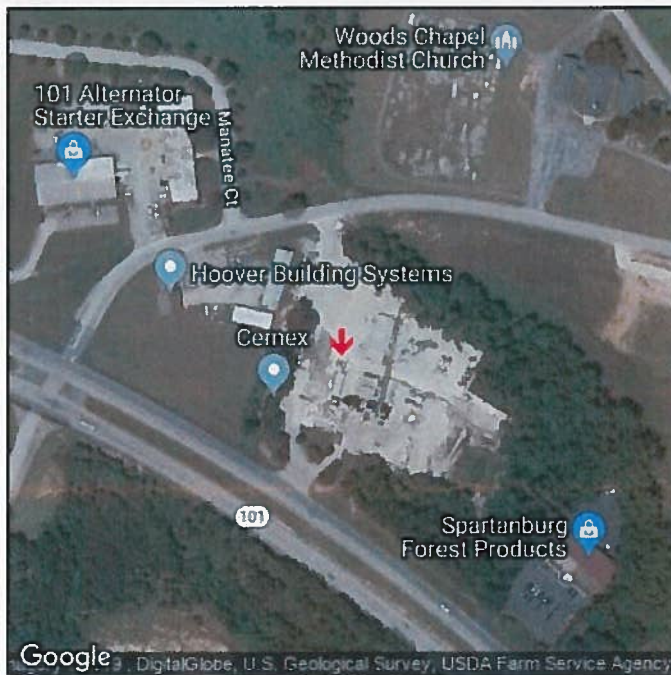
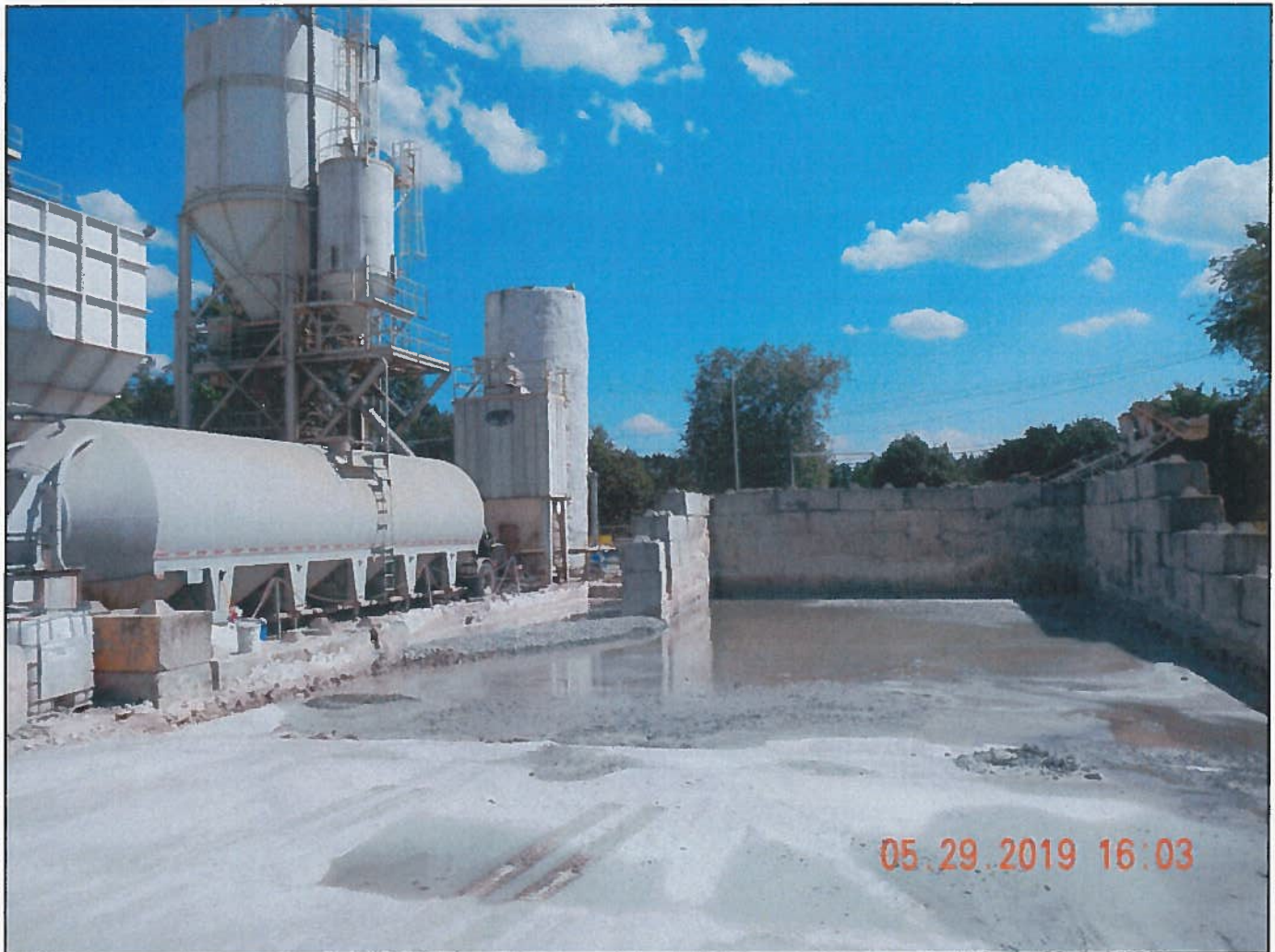
Attributes

Description	Closer view of outfall 002 area. Samples are grabbed from concrete spillway prior to entry to bottom of ditch about where the blue paint starts. The culvert (bottom right corner) connects to the ditch on the west side of the driveway entrance. Flow from right to left, to upper left.
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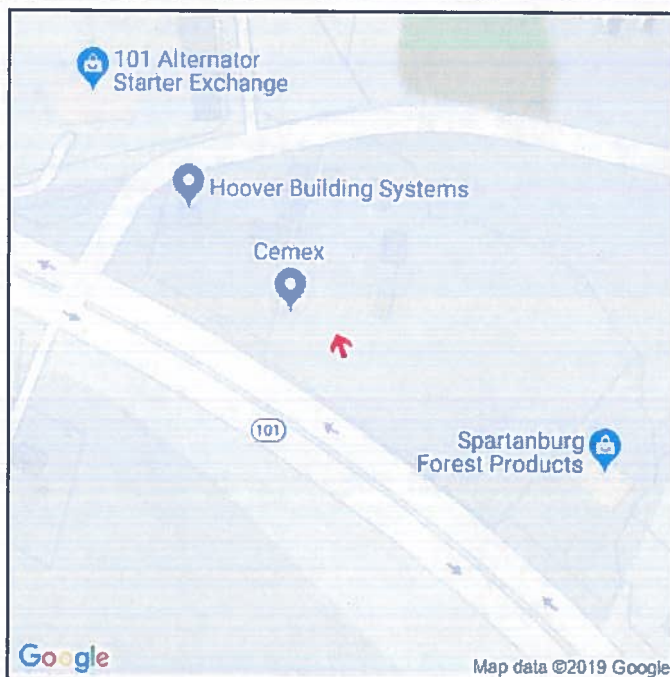
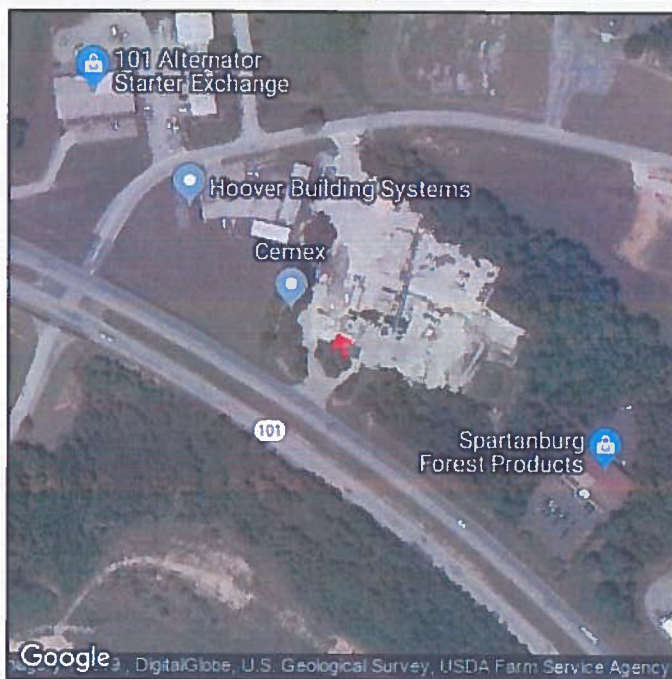
Attributes

Description	Truck wash station, located about mid-plant, along western border. Looking easterly. Flow heads toward water reuse basin mid-plant. See photo DSCN1789.
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Attributes

Description	Truck wash water is captured here, flows through a gravel berm center of photo, and is then caught and reused in the concrete mixes as allowed by the concrete recipe.
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Attributes

Description	Truck concrete washout water is captured in these two basins, just southwest of the truck loading tower.
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CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Mr. Harvey Gosnell
Plant Lead Manager
Concrete Supply Company
1401 Highway 101
Greer, South Carolina 29651

Re: Compliance Stormwater Evaluation Inspection
Concrete Supply Co. Greer, South Carolina, Permit SCR005480

Dear Mr. Gosnell:

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The EPA appreciates your cooperation in conducting this CSWEI. Enclosed is the EPA's CSWEI report, evaluating your compliance with the CWA. As a result of the inspection, the EPA may be in further contact with Concrete Supply Company in the future.

While a response from you is not required at this time, if you do wish to respond to the CSWEI report, provide additional information, or otherwise discuss the report, please contact Mark Robertson at the above address or by email at Robertson.Mark@epa.gov.

Sincerely,

Daniel J. O'Lone, Chief
Stormwater and Residuals Enforcement Section
NPDES Permitting and Enforcement Branch

Enclosures

cc: Mr. Brian Wisnewski
South Carolina Department of Health and Environmental Control
Mr. Johnie Alexander
CSC LLC

Concurrence:



Robertson 7/24



Kwan

7/24/19

Mailing addresses:

Brian Wisnewski
SCDHEC - Bureau of Water
2600 Bull Street
Columbia, SC 29201

Mr. Johnie Alexander
Environmental Manager
Concrete Supply Co.
3823 Raleigh Street
Charlotte, NC 28206

Inspection Reports

Date: 7/24/19

ROUTING AND TRANSMITTAL SLIP

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1. Robertson		MR	7/24
2. Kwan / <i>Inland</i>		MR, for	7/24 ^{SST} 7/20 w/ <i>onward</i>
3. Mattox (Tracking) - <i>electronic mail</i>		- email -	
4. Admin		SDF	8/7/19
5. O'Lone (Signature)		DFO	8/14
6. Admin/(Mailing) & Copy to Mattox			68-15-19
7. Mark Robertson			

	Action		File		Note and Return
X	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate	X	Signature
	Coordination		Justify		

From: (Name, org. symbol, Agency/Post)		Room No.—Bldg. 15 th floor
Mark Robertson, ECAD-WEB-SGS		Phone No. 9639

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions.

REMARKS:

Inspection report for the NPDES Industrial Stormwater Inspection of Concrete Supply Co. facility in Greer, SC.

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